

ORIGINAL

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In Re)
)
Amendment of Section 73.202(b)) MM Docket _____
Table of Allotments,) RM- _____
FM Broadcast Stations)
Merced and North Fork, CA)

To: Chief, Policy and Rules Division

PETITION FOR RULEMAKING

San Joaquin Radio Company, LLC ("San Joaquin"), licensee of Station KAJZ(FM) (formerly KFIE), Merced, California, hereby petitions for amendment of Section 73.202(b) of the Commission's Rules to delete Station KAJZ' current channel allotment, Channel 299A, at Merced, California, to allot Channel 300B1 at North Fork, California, and simultaneously with these actions, to modify Station KAJZ' license to specify operation on Channel 300B1 at North Fork.

Attached hereto is an Engineering Statement prepared by the consulting engineering firm of Hatfield & Dawson which establishes that Channel 300B1 can be assigned for use at North Fork in compliance with the Commission's FM station separation and city coverage rules using as a reference point the site that San Joaquin plans to specify as KAJZ' transmitter site if this Petition is granted which is located approximately 5 kilometers from North Fork.

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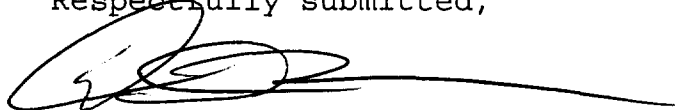
North Fork is a self contained unincorporated community. North Fork has a chamber of commerce, its own fire department, a library, a community development council, a recreation center, a town hall, a local elementary school, a post office and a local museum. North Fork has at least five churches and more than two dozen businesses. Although the *Rand McNally Atlas* lists North Fork's population as of 1990 as 905, according to the North Fork post office, more than 5,000 people receive their mail addressed to "North Fork."

The proposed relocation and upgrade of KAJZ' channel of operation from Class A at Merced to Class B1 at North Fork will serve the goals of Section 307(b) of the Communications Act as it will provide North Fork with a first local radio service while Merced will remain well served with 4 FM stations and 2 AM stations, plus a new expanded band AM station soon to begin operating. Additionally, although the proposed channel change will require Station KAJZ to change its transmitter site, resulting in areas that will both gain and lose service from KAJZ, as shown in the Engineering Statement, adoption of the proposal will result in a net gain in the population receiving primary service from Station KAJZ of 345%, and all areas that will lose primary service from Station KAJZ as a consequence of the station changing its site will continue to receive primary service from 5 or more full-time stations.

If this Petition is granted, San Joaquin will promptly file an application to implement the channel change and related site

change and, upon grant of such application, will promptly
construct new facilities for Station KAJZ on Channel 300B1.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David Tillotson', with a long horizontal flourish extending to the right.

David Tillotson
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**Attorney for San Joaquin Radio
Company, LLC**

Date: February 18, 1999

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ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS FOR THE FEDERAL
COMMUNICATIONS COMMISSION

TO ASSIGN FM CHANNEL 300B1
FOR USE AT NORTH FORK, CALIFORNIA

SAN JOAQUIN RADIO COMPANY, LLC

2/99

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of San Joaquin Radio Company, LLC ("San Joaquin"), licensee of FM station KAJZ (formerly KFIE), channel 299A at Merced, California, in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules. San Joaquin proposes the reallocation of channel 299A at Merced to channel 300B1 at North Fork, California, and the modification of station KAJZ's license to specify North Fork as its community of license.

As outlined in the attached channel study, channel 300B1 can be assigned for use at North Fork in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this channel study the coordinates of San Joaquin's preferred site on Smiley Mountain have been used: NL 37° 14' 39" x WL 119° 33' 58". This site is 5 kilometers from North Fork, the reference coordinates of which are NL 37° 15' 44" x WL 119° 42' 00". The nominal distance to the 70 dBu F(50,50) contour for a Class B1 station is 23 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of North Fork.

Local Service Considerations

This proposal will provide first local service to North Fork. Merced will not be deprived of local

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service, as stations KBKY(FM) 231A, KABX(FM) 248B, KAMB(FM) 268B, KIBG(FM) 292A, KYOS(AM) 1480 kHz, and KTFN(AM) 1580 kHz will remain licensed to Merced. In addition, KTFN(AM)'s expanded band operation on 1660 kHz is also licensed to Merced.

Gain and Loss Areas

KAJZ presently provides 60 dBu service to 136,681 persons in a 2507 km² area. The proposed allotment (assuming operation at the Smiley Mountain site with standard Class B1 facilities of 25 kW ERP at 100 meters HAAT) would provide 60 dBu service to 620,052 persons in a 7998 km² area. This represents an increase in 60 dBu service of 483,371 persons, or 354%, over the present facility.

Since this proposal will require a site change, there will be associated gain and loss areas. The attached map exhibit depicts the present KAJZ and proposed allotment 60 dBu contours. The gain area covers 620,052 persons and 7998 km². The loss area covers 136,681 persons and 2507 km². An engineering review confirms that this proposal will not result in the creation of any "white", "gray", or underserved areas. All portions of the loss area receive full-time service from at least five other radio stations.

No Tuck Analysis Required

The proposed allotment will not place a 70 dBu contour over 50% of any urbanized area. Therefore, no "Tuck" analysis will be required.

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No Mexican Concurrence Required

North Fork is not located within 320 kilometers of the US-Mexico border. Therefore, Mexican concurrence to this proposal will not be required.

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Seattle, WA

FM SEPARATION STUDY

Job Title :300B1 North Fork

Separation Buffer 100 km

FCC DB Date : 01/25/99

Channel 300B1 (107.9 MHz)

Coordinates : 37-14-39 119-33-58

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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KSEQ LIC	Visalia CA	BLH870320KD	246B 97.1	17.0 237.0	36-38-08 118-56-32	140.5	87.48 70.48	17 CLEAR
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ALC	Coalinga CA	Docket97-204	247A 97.3	.0	36-12-37 120-25-35	214.0	138.10 126.10	12 CLEAR
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A filing window for this channel will be opened by the Commission in a subsequent order.

Site Restriction 10.0 km Northwest - Effective 6-15-98 per D97-204

KMMM CP	Madera CA	BPH870827NM	297A 107.3	3.00 100.0	36-55-11 120-07-03	233.8	60.84 12.84	48 CLOSE
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*To Channel 296A per One Step Application BPH-940325MA (Denied) New One-Step Application BPH-960722IC

KMPHF LIC	Hanford CA	BLH880915KA	298B 107.5	20.5 239.0	36-38-12 118-56-34	140.5	87.35 16.35	71 CLEAR
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KFIE LIC	Merced CA	BLH941026KC	299A 107.7	5.0 110.0	37-25-34 120-26-23	284.9	80.02 -15.98	96 SHORT
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K299AF LIC	Bridgeport, etc. CA	BLFT931109TB	299D 107.7	.106 564.0	DA 38-05-30 119-10-26	20.0	100.24 .00	0 TRANS
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Translator for KMMT, Mammoth Lakes, CA-
Vertical polarization only

NEW-T APP	Bass Lake CA	BPFT971017TD	300D 107.9	.002 879.0	DA 37-17-42 119-33-51	1.9	5.65 .00	0 TRANS
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Translator for KAWZ, Twin Falls, ID.-Amended 980713-Amended 981103

NEW-T APP	Mariposa CA	BPFT970707TL	300D 107.9	.009 835.0	DA 37-32-00 120-01-29	308.6	51.77 .00	0 TRANS
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Translator For KAAT, Oakhurst, CA
Major Amendment to BPFT-950724TF

K202BO APP	Big Pine, etc. CA	BPFT971015TA	300D 107.9	0.01 1615.0	DA 36-58-33 118-07-22	102.7	131.71 .00	0 TRANS
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Translator for KNIS, Carson City, NV.
From Channel 202

KSEA LIC	Greenfield CA	BLH980911KE	300B1 107.9	.87 499.0	36-23-00 121-25-40	240.6	191.64 16.64	175 CLEAR
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Seattle, WA

FM SEPARATION STUDY

Job Title :300B1 North Fork

Separation Buffer 100 km

FCC DB Date : 01/25/99

Channel 300B1 (107.9 MHz)

Coordinates : 37-14-39 119-33-58

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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KUZZFM LIC	Bakersfield CA	BLH940302KD	300B 107.9	6.0 416.0	35-26-20 118-44-24	159.5	213.61 2.61	211 CLOSE
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KDND LIC	Sacramento CA	BLH850716KA	300B 107.9	50. 123.0	38-42-38 121-28-54	314.7	234.13 23.13	211 CLEAR
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** End of separation study for channel 300B1 **

CERTIFICATION

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments to specify channel 300B1 for use at North Fork, California has been prepared on behalf of San Joaquin Radio Company, LLC. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

February 16, 1999



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers

